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September 24, 2024

Via ECF

Hon. Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Revlon Consumer Products LLC, et al. v Give Back Beauty S.A., et al.*,
Case No. 1:24-cv-06438-ER-RWL

Dear Judge Ramos:

We represent Plaintiffs Revlon Consumer Products LLC (“Revlon”) and Elizabeth Arden, Inc. (“Elizabeth Arden”) in this action alleging, *inter alia*, Defendants’ misappropriation of Plaintiffs’ trade secrets. Plaintiffs submit this letter motion in accordance with Fed. R. Civ. P. 5.2 and Your Honor’s Individual Rule 3.2, requesting permission to file under seal limited information within Plaintiffs’ reply memoranda in support of their motions for a preliminary injunction and for expedited discovery, as well as an exhibit to the Declaration of Linda King.

Like Plaintiffs’ moving papers, the reply papers refer to, discuss and attach information that is highly sensitive and confidential concerning Revlon’s fragrance business and licensing agreements. This information forms a vital part of Plaintiffs’ fragrance business and is closely-guarded by Plaintiffs. There is no legitimate public interest in the disclosure of this proprietary business information, whereas public disclosure would seriously hurt Plaintiffs’ competitive standing. This proprietary business information at issue here warrants sealing. *See, e.g., New York v. Actavis, PLC*, No. 14 CIV. 7473, 2014 WL 5353774, at *3 (S.D.N.Y. Oct. 21, 2014) (recognizing the propriety of sealing “trade secrets and material that would place a party at a competitive disadvantage”).

Pursuant to Your Honor’s Individual Rule 2.A.ii, Plaintiffs are filing this letter motion to seal without first seeking a conference in order to protect the sensitive information being filed today to meet the court-ordered deadline.

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For these reasons, Plaintiffs respectfully request that this Court grant Plaintiffs' letter motion and allow the materials being filed under seal to remain under seal.

We thank the Court for its consideration of this request.

Respectfully submitted,

s/ Elyse D. Echtman
Elyse D. Echtman

Counsel for Plaintiffs